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US DISTRICT COURT
DISTRICT OF NEVADA

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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 URIEL LIRA-CABRERA,
aka "Moises Munoz-Rodriguez,"
14 aka "Hugo Padilla,"

15 Defendant.

Case No. 2:25-mj-00236-NJK

CRIMINAL COMPLAINT
for violation of Deported Alien
Found in the United States
(8 U.S.C. § 1326(a) and (b))

16 BEFORE the Honorable Nancy J. Koppe, United States Magistrate Judge, Las
17 Vegas, Nevada, the undersigned Complainant, being duly sworn, deposes and states:

18 COUNT ONE
Deported Alien Found in the United States
19 (8 U.S.C. § 1326(a) and (b))

20 On or about On March 5, 2025, in the State and Federal District of Nevada,
21 URIEL LIRA-CABRERA,
aka "Moises Munoz-Rodriguez,"
22 aka "Hugo Padilla,"
23 defendant herein, an alien, was found in the United States after having been deported and
24 removed therefrom on or about February 7, 2007, September 11, 2013, November 15, 2016,

1 March 27, 2017, August 27, 2018, and November 27, 2021, having reentered and remained
2 in the United States, and not having obtained the express consent of the Attorney General
3 of the United States or the Secretary of Homeland Security to reapply for admission to the
4 United States, in violation of 8 U.S.C. § 1326(a) and (b).

5 **PROBABLE CAUSE**

6 I, Raymond Thayer, state the following as and for probable cause.

7 1. I have been employed with the United States Department of Homeland
8 Security (“DHS”), Immigration and Customs Enforcement (“ICE”), as an Immigration
9 Enforcement Agent and Deportation Officer (“DO”) since February 2007. I am currently
10 assigned as a DO to the Las Vegas Office’s Enforcement and Removal Operations
11 Criminal Prosecution’s Section. In this capacity, I investigate and process a range of
12 immigration related offenses mainly focusing on obtaining federal prosecutions and
13 indictments for violent criminal aliens, such as violations of 8 U.S.C. §§ 1325 and 1326.

14 2. This Affidavit is made in support of a criminal complaint against URIEL
15 LIRA-CABRERA (“Defendant”), also known as Moises Munoz-Rodriguez and Hugo
16 Padilla, for a violation of 8 U.S.C. § 1326(a) and (b), Deported Alien Found in the United
17 States. The information contained in this Affidavit is based on my own personal
18 investigation and information communicated to me by other law enforcement officers with
19 personal knowledge of facts relevant to this investigation. The Affidavit is intended only to
20 show that there is probable cause for the requested complaint and does not purport to set
21 forth all of my knowledge of, or investigation into, this matter.

22 3. On February 27, 2025, ICE learned that Defendant may be residing in Las
23 Vegas, Nevada. Because ICE records indicated Defendant is a citizen and national of
24 Mexico, by virtue of birth, who was previously removed from the United States and because

1 records indicated Defendant was not in possession of valid immigration documents
2 allowing him to be present or remain in the United States, ICE opened an investigation. On
3 March 5, 2025, ICE Las Vegas Fugitive Operation Team deportation officers, while
4 conducting surveillance, encountered, identified, and apprehended the Defendant in Las
5 Vegas, Nevada.

6 4. On or about March 10, 2025, I reviewed printouts from the Federal Bureau
7 of Investigation ("FBI") relating to Defendant. Based on my training and experience, I
8 know that the FBI databases contain records of arrests and convictions of individuals,
9 based on an individual's FBI number. I also know that an FBI number is assigned based on
10 unique fingerprint characteristics, and that police departments routinely fingerprint each
11 person who is booked into custody for identification purposes and inclusion into criminal
12 history databases.

13 5. A query of Defendant's automated criminal history confirmed that he had
14 been convicted of the following felony prior to his most recent removal, which subjects him
15 to the heightened penalty provisions of 8 U.S.C. § 1326(b): on or about November 16, 2005,
16 Defendant was convicted of Assault with Deadly Weapon by Means Likely to Produce
17 Great Bodily Injury, in violation of California Penal Code 245(a)(1), in the Superior Court,
18 Los Angeles County, California, Case No. FWV036065.

19 6. On or about March 5, 2025, I obtained the DHS Administrative File ("A-
20 File") for the subject assigned Alien Registration Number 099 494 432, whose name of
21 record is "Uriel Lira-Cabrera" (hereinafter, the "Lira-Cabrera A-File"). Based on my
22 training and experience, I know that a DHS A-File is a file maintained by DHS in which
23 immigration records are maintained for an alien admitted to, or found in, the United States.
24 I also know that a DHS A-File usually contains photographs, fingerprints, court records of

1 conviction, and all records relating to deportation or other actions by DHS – or its
2 predecessor, the Immigration and Naturalization Service (“INS”) – with respect to the
3 subject alien for whom the DHS A-File is maintained. As discussed in more detail below,
4 my review of the Lira-Cabrera A-File confirmed that this A-File corresponds with
5 Defendant.

6 7. The Lira-Cabrera A-File contained the following documents and information,
7 among other things, regarding Defendant’s immigration status:

8 a. Executed Warrants of Removal / Deportation (ICE Forms I-205)
9 indicating that Defendant was officially removed and deported from the United States to
10 Mexico on or about February 7, 2007, September 11, 2013, November 15, 2016, March 27,
11 2017, August 27, 2018, and November 27, 2021. I know from my training and experience
12 that a Warrant of Removal / Deportation (ICE Form I-205) is executed each time a subject
13 alien is removed from the United States by ICE (and in the past by its predecessor agency,
14 the INS) and usually contains the subject’s photograph, signature, and / or fingerprints.
15 The executed Warrants of Removal / Deportation (ICE Forms I-205) referenced above
16 that I found in the Lira-Cabrera A-File contains Defendant’s photograph, signature, and
17 fingerprints.

18 b. A Record of Deportable / Inadmissible Alien (Forms I-213) dated
19 March 5, 2025, stating that Defendant is a native and citizen of Mexico.

20 c. Record of sworn statement dated August 27, 2018, where the
21 Defendant admits he is a native and citizen of Mexico.

22 d. Defendant’s Mexican Passport, and Birth Certificate.


23 8. On or about March 10, 2025, I reviewed certain printouts of ICE computer
24 indices contained in the Lira-Cabrera A-File. Based on my training and experience, I know

that ICE computer indices track and document each time an alien has been deported from the United States by ICE (or previously by the INS) or was granted permission to enter or re-enter the United States. The ICE computer indices confirmed that Defendant had been removed and deported on or about the dates indicated on the Warrants of Removal / Deportation (ICE Forms I-205) found in the Lira-Cabrera A-File.

9. Based on my review of the Lira-Cabrera A-File, I determined that it does not contain any record of him ever having received permission from the Attorney General or his designated successor, the Secretary of Homeland Security, to legally re-enter the United States. Based on my training and experience, I know that such documentation is required to re-enter the United States legally after deportation and that, if such documentation existed, it would ordinarily be found in the Lira-Cabrera A-File.

10. Based on my training, experience, and review of the contents of the Lira-Cabrera A-File, in particular the Warrants of Removal / Deportation, which indicate that Defendant had been deported to Mexico, I determined that Defendant is an alien – that is, a citizen of Mexico.

11. Based on the above, I believe there is probable cause that URIEL LIRA-CABRERA did violate 8 U.S.C. § 1326(a) and (b) (Deported Alien Found in United States).


Raymond Thayer, Deportation Officer
Immigration and Customs Enforcement

Sworn and subscribed before me on this 18th day of March 2025.


HON. NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE